

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

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Roderick Roberson, Michael Hudson, Dylon White, Caleb Schmitt, Justin Berberich, Chris Ulrich, and Ron Collins, individually and on behalf of others similarly situated,

Case No. 22-CV-358

Plaintiffs,

v.

**DECLARATION OF NICHOLAS  
THOMPSON**

The Kansas City Southern Railway Co.,

Defendant.

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I, Nicholas Thompson, declare as follows:

1. I represent Plaintiffs in this action. I have personal knowledge of the facts contained in this declaration. If called as a witness, I could and would testify competently to the matters stated below.

2. I frequently represent employees against Defendant The Kansas City Southern Railway Co. ("KCS"). In the course of my work, I have come to know Noah Garcia, KCS's general counsel. Through my work, I communicate with Mr. Garcia frequently.

3. On May 31, 2022, I emailed Mr. Garcia the court-stamped versions of the complaint in this action and all documents attached thereto, this Court's notice docketed at ECF No. 2 and 2-1, Plaintiffs' motion for a temporary restraining order, Plaintiffs' suggestions in support of their motion for a temporary restraining order, Plaintiffs' proposed order granting their motion for a temporary restraining order, the declarations of the seven Plaintiffs, including all exhibits attached

to those declarations, the declaration of Eric Prewitt, and Plaintiffs' motion to exceed the default page limit.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 31, 2022

s/ Nicholas Thompson  
Nicholas Thompson